

1 WEIL, GOTSHAL & MANGES LLP  
2 Stephen Karotkin (*pro hac vice*)  
(stephen.karotkin@weil.com)  
3 Theodore Tsekerides (*pro hac vice*)  
(theodore.tsekerides@weil.com)  
4 Jessica Liou (*pro hac vice*)  
(jessica.liou@weil.com)  
5 Matthew Goren (*pro hac vice*)  
(matthew.goren@weil.com)  
6 767 Fifth Avenue  
7 New York, NY 10153-0119  
Tel: 212 310 8000  
Fax: 212 310 8007

KELLER BENVENUTTI KIM LLP  
Tobias S. Keller (#151445)  
(tkeller@kbkllp.com)  
Peter J. Benvenutti (#60566)  
(pbenvenutti@kbkllp.com)  
Jane Kim (#298192)  
(jkim@kbkllp.com)  
650 California Street, Suite 1900  
San Francisco, CA 94108  
Tel: (415) 496-6723  
Fax: (650) 636 9251

## *Attorneys for Debtors and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re:

## PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC COMPANY,**  
**Debtors.**

- Affects PG&E Corporation
- Affects Pacific Gas and Electric Company
- Affects both Debtors

Case No. 19-30088 (DM)  
Chapter 11  
(Lead Case)  
(Jointly Administered)

**STIPULATION ENLARGING TIME  
FOR CATLIN RICE TUCKER,  
DARIAN RAHGANI TUCKER, M.T.  
(A MINOR), C.R.T. (A MINOR),  
AND CATLIN RICE TUCKER AND  
DARIAN RAHGANI TUCKER  
TEES U/A DATED 10/19/2011 TO  
FILE PROOFS OF CLAIM**

[Related to Dkt. Nos. 7886-87]

Resolving Motion Scheduled for Hearing  
July 7, 2020 at 10:00 am PT

1 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the  
2 “**Utility**”), as debtors and debtors in possession (collectively, the “**Debtors**”) in the above-  
3 captioned cases (the “**Chapter 11 Cases**”), on the one hand, and Catlin Rice Tucker, Darian  
4 Rahgani Tucker, M.T. (a minor), C.R.T. (a minor), and Catlin Rice Tucker and Darian Rahgani  
5 Tucker TEES U/A dated 10/19/2011 (collectively, the “**Movants**”), on the other hand, by and  
6 through their respective counsel, hereby submit this stipulation (the “**Stipulation**”) for an order  
7 enlarging the time for Movants to file claims in these Chapter 11 Cases as set forth herein. The  
8 Debtors and Movants are referred to in this Stipulation collectively as the “**Parties**,” and each as a  
9 “**Party**.” The Parties hereby stipulate and agree as follows:

10 **RECITALS**

11 A. On January 29, 2019 (the “**Petition Date**”), the Debtors commenced these Chapter 11  
12 Cases in the United States Bankruptcy Court for the Northern District of California (the  
13 “**Bankruptcy Court**”).

14 B. By Order dated July 1, 2019 [Docket No. 2806] (the “**Bar Date Order**”), the  
15 Bankruptcy Court set October 21, 2019 at 5:00 p.m. (Prevailing Pacific Time) (the “**Original Bar**  
16 **Date**”) as the deadline in these Chapter 11 Cases for filing proofs of claim in respect of any of  
17 prepetition claim (as defined in section 101(5) of the Bankruptcy Code) against either of the Debtors,  
18 including all claims of Fire Claimants,<sup>1</sup> Wildfire Subrogation Claimants, Governmental Units (as  
19 defined in section 101(27) of the Bankruptcy Code), and Customers, and for the avoidance of doubt,  
20 including all secured claims and priority claims.

21 C. By Order dated November 11, 2019, the Bankruptcy Court extended the Bar Date  
22 until December 31, 2019 at 5:00 p.m. (Prevailing Pacific Time), solely for the benefit of any non-  
23 governmental Fire Claimants who had not filed proofs of claim by the Original Bar Date.

24 D. On June 10, 2020, Movants filed the *Motion to Allow/Deem Timely Late Filing of*  
25 *Proof of Claim by Catlin Rice Tucker, Darian Rahgani Tucker, M.T. (minor), C.R.T. (a minor), and*

27 <sup>1</sup> Capitalized terms used but not otherwise herein defined have the meanings ascribed to such terms  
28 in the Bar Date Order.

1      *Catlin Rice Tucker and Darian Rahgani Tucker TEES U/A dated 10/19/2011* [Dkt. No. 7886] (the  
2      “**Motion**”), in which Movants assert they should be permitted to file late claims for damages  
3      allegedly sustained as a result of the North Bay Fires (the “**Asserted Claims**”). The Motion is set  
4      for hearing on July 7, 2020 (the “**Hearing**”). *See* Dkt. No. 7887.

5              E.      On April 27, 2020, Darian Rahgani Tucker filed Proof of Claim No. 103519, Catlin  
6      Rice Tucker filed Proof of Claim No. 103520, and Catlin Rice Tucker and Darian Rahgani Tucker  
7      TEES U/A dated 10/19/2011 filed Proof of Claim No. 103521, on account of their respective  
8      Asserted Claims that are the subject of the Motion (the “**Proofs of Claim**”).

9              F.      The Debtors have raised with Movants certain informal objections to the relief  
10     requested in the Motion.

11              G.      The Official Committee of Tort Claimants has reviewed the Stipulation and, based on  
12     the facts presented in the Motion, has no objection to the agreements set forth herein or to entry of an  
13     Order approving the terms of the Stipulation.

14              H.      The Parties hereto desire to resolve their issues regarding the Motion.

15              **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE  
16     INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS  
17     STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE  
18     UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE BANKRUPTCY COURT  
19     TO ORDER, THAT:**

20              1.      The Proofs of Claim shall be deemed timely filed.

21              2.      Nothing herein is intended to, nor shall it be construed to be, a waiver by the Debtors  
22     or any other party in interest of any right to (i) object to the Asserted Claims or the Proofs of Claim  
23     on any grounds other than the untimely filing thereof, or (ii) seek to reclassify the Proofs of Claim.

24              3.      Nothing herein is intended to, nor shall it be construed to be, a waiver by Movants of  
25     their right to seek to reclassify the Proofs of Claim or to assert any other right in contravention to or  
26     in opposition of any asserted challenge to the Proofs of Claim.

27              4.      Upon entry of an Order approving the Stipulation, the Motion shall be deemed  
28     withdrawn and the Hearing vacated.

5. In the event that the terms of this Stipulation are not approved by the Bankruptcy Court, it shall be null and void and have no force or effect and the Parties agree that, in such circumstances, this Stipulation shall be of no evidentiary value whatsoever in any proceedings.

6. This Stipulation shall be binding on the Parties and each of their successors in interest.

7. This Stipulation shall constitute the entire agreement and understanding of the Parties relating to the subject matter hereof and supersede all prior agreements and understandings relating to the subject matter hereof.

8. This Stipulation may be executed in counterparts, each of which shall be deemed an original but all of which together shall constitute one and the same agreement.

9. The Bankruptcy Court shall retain jurisdiction to resolve any disputes or controversies arising from this Stipulation or any Order approving the terms of this Stipulation.

[*Remainder of Page Intentionally Left Blank*]

1 Dated: June 17, 2020  
2 WEIL GOTSHAL & MANGES LLP  
3

4 /s/ Matthew Goren  
5 Matthew Goren, Esq.

6 *Attorneys for Debtors  
and Debtors in Possession*

Dated: June 17, 2020  
WATTS GUERRA LLP

/s/ Mikal Watts  
Mikal C. Watts, Esq.

*Attorneys for Catlin Rice Tucker, Darian  
Rahgani Tucker, M.T. (minor), C.R.T. (a  
minor), and Catlin Rice Tucker and Darian  
Rahgani Tucker TEES U/A dated 10/19/2011*

10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28